

REMARKS/ARGUMENTS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested.

Claims 1-60 are pending in this case.

Claims 1-60 were rejected in the outstanding Office Action under 35 U.S.C. 102(e) as anticipated by Moshfeghi (U.S. Patent No. 6,476,833).¹

At the outset, Applicant respectfully notes that, as set out in MPEP § 2131, “[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631. Further, “[t]he identical invention must be shown in as complete detail as is contained in the...claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236. Applicant respectfully submits that Moshfeghi does not include each and every element of any of the claims, **in as complete detail** as contained in the claims.

Applicant now traverses the rejection of the claims under 35 U.S.C. § 102(e).

Claim 1 is directed to a web page creation apparatus and includes “a Web page creation unit configured to create a Web page having operation items based on operation-item display information which is defined based on a device that displays the Web page.”

Moshfeghi describes “browsing markup language documents from within the context of an executing application.”² In Moshfeghi, “some users are allowed to access any resource on the public Internet or private intranets, while other users can only access the limited lists of resources...the functionality and appearance of the user interface of the embedded browser sub-window is also configured from information in the user profile.”³

¹ Although the listing of rejected claims at page 2 of the outstanding Office Action does not include Claim 60, Applicant believes this to be an erroneous omission in light of the discussion of Claim 60 at page 11 of the outstanding Office Action.

² See Moshfeghi at column 3, lines 8-10.

³ See Moshfeghi at column 3, lines 13-22.

Moshfeghi does not teach or suggest changing any aspect of the content displayed on a Web page “based on a device that displays the Web page,” as recited in Claim 1. In fact, Moshfeghi teaches away from editing of content based on any factor other than the user’s profile with the statement that the “administrator of the system in which an application according to this invention is installed can change the resource access and browsing function privileges of users by editing the content of their user profiles.”⁴

The outstanding Office Action cites portions of Moshfeghi and states that “the reference teaches selectively restricting access to specific content and profile representations of all the linking information addressing of all the network resources allowed to the user.”⁵

Applicant respectfully submits that the outstanding Office Action does not clarify how the description of user-profile-related editing of available content in Moshfeghi anticipates “a Web page creation unit configured to create a Web page having operation items based on operation-item display information which is defined based on a device that displays the Web page,” as recited in Claim 1.

Because Moshfeghi does not teach or suggest “a Web page creation unit configured to create a Web page having operation items based on operation-item display information which is defined based on a device that displays the Web page,” as recited in Claim 1, Applicant respectfully requests that the rejection of Claim 1 under 35 U.S.C. § 102(e) be withdrawn.

Claims 2-10 and 60 depend from Claim 1 and are, therefore, patentable for at least the reasons discussed above with respect to Claim 1. Accordingly, Applicant respectfully requests that the rejection of Claims 2-10 and 60 under 35 U.S.C. § 102(e) be withdrawn.

Claim 11 is directed to a Web page creation apparatus and includes:

a Web page creation unit configured to create a Web page having operation items corresponding to functions of an external device; and

⁴ See Moshfeghi at column 3, lines 22-25.

⁵ See outstanding Office Action at page 3.

an inquiry unit configured to transmit an inquiry about usable functions of the external device to the external device, wherein the Web page creation unit is configured to create the Web page based on both operation-item display information, which indicates the operation items to be displayed and which is defined based on a device that displays the Web page or on a user of the device, and usable function identification information, which is received from the external device in response to the inquiry of the inquiry unit and indicates the usable functions of the external device, so that only the operation items corresponding to the usable functions of the external device are displayed.

The outstanding Office Action again cites portions of Moshfeghi that discuss user-profile-based editing and availability of content and states that Fig. 3 of Moshfeghi illustrates “operations items presented to a user in a user-specific format corresponding to the usable function of the external device indicated by the usable function identification information.”⁶

Applicant respectfully submits that the outstanding Office Action is unclear as to an interpretation of Moshfeghi, stated in the outstanding Office Action itself as being user-specific, that would read on Claim 11, which recites a Web page creation unit “configured to create the Web page based on both operation-item display information, which indicates the operation items to be displayed and which is defined based on a device that displays the Web page or on a user of the device, and usable function identification information, which is received from the external device in response to the inquiry of the inquiry unit and indicates the usable functions of the external device.” Further, no portion of Moshfeghi has been cited as teaching “an inquiry unit,” as recited in Claim 11. Finally, Applicant respectfully submits that there is no reasonable interpretation of Moshfeghi that would read on the features recited in Claim 11.

Because Moshfeghi does not teach or suggest a Web page creation unit “configured to create the Web page based on both operation-item display information, which indicates the

⁶ See outstanding Office Action at page 7.

operation items to be displayed and which is defined based on a device that displays the Web page or on a user of the device, and usable function identification information, which is received from the external device in response to the inquiry of the inquiry unit and indicates the usable functions of the external device” or “an inquiry unit,” as recited in Claim 11, Applicant respectfully requests that the rejection of Claim 11 under 35 U.S.C. § 102(e) be withdrawn.

Claims 12-22 depend from Claim 11 and are, therefore, patentable for at least the reasons discussed above with respect to Claim 11. Thus, Applicant respectfully requests that the rejection of Claims 12-22 under 35 U.S.C. § 102(e) be withdrawn.

Claim 23 is directed to a Web page creation apparatus and includes:

a Web page creation unit configured to create a Web page having operation items corresponding to functions of different external devices respectively; and

a permitted-function inquiry unit configured to transmit an inquiry about allowability of execution of a corresponding one of the functions for one of the operation items, to each of the external devices,

wherein the Web page creation unit is configured to create the Web page based on both operation-item display information, which indicates the operation items to be displayed and which is defined based on a device that displays the Web page or on a user of the device, and permitted-function identification information, which is received from the external devices in response to the inquiry of the permitted-function inquiry unit and indicates the allowability of execution of each of the functions, so that only the operation items corresponding to the permitted functions of the external devices are displayed.

The outstanding Office Action states that Claims 23-36 are rejected under similar rationale as Claims 1-22.

Applicant respectfully re-submits that the rejection of Claims 1-22 and, thus, Claims 23-36, is unclear as to how the user-profile-specific content creation apparatus of Moshfeghi

can be asserted to anticipate a Web page creation apparatus as recited in Claims 1-22 and, thus, Claims 23-36.

Further, Applicant respectfully submits that Moshfeghi does not teach or suggest “a permitted-function inquiry unit configured to transmit an inquiry about allowability of execution of a corresponding one of the functions for one of the operation items, to each of the external devices,” as recited in Claim 23. Moshfeghi uses the user profile to determine the content that is available to a given user, but Moshfeghi does not teach or suggest transmitting “an inquiry about allowability of execution of a corresponding one of the functions for one of the operation items” to external devices, as recited in Claim 23.

Thus, Applicant respectfully requests that the rejection of Claim 23 under 35 U.S.C. § 102(e) be withdrawn.

Claims 24-36 depend from Claim 23 and are, therefore, patentable for at least the reasons discussed above for Claim 23. Thus, Applicant respectfully requests that the rejection of Claims 24-36 under 35 U.S.C. § 102(e) be withdrawn.

Claim 37 is directed to a method of controlling Web page creation and includes “creating first style information for each of the operation items indicated for display, based on operation-item display information, which indicates the operation items to be displayed and which is defined based on a device on which the Web page is displayed or a user of the device.”

The outstanding Office Action references the rejection of Claims 1-22 in the rejection of Claims 37-50. On page 5, the outstanding Office Action states with respect to Claim 7 that the “set of all possible URIs can generally be structured as a tree, or as a forest of trees, or, generally, as a directed graph. All are examples of different styles of presentation to a user.”

In Moshfeghi, the list of URIs available is dependent on a user’s profile, but the structure for display of those available URIs is not taught or suggested to be dependent on the

user's profile or on a device displaying the list of available URIs. Moshfeghi states that "the user profile records for a user a representation of the URIs of all allowed network resources," at column 9, lines 6-8. However, at column 9, lines 50-58, Moshfeghi suggests that the representation recorded in a user profile is not dependent on the user but rather on the number of URIs to which a user has access.

Because Moshfeghi does not teach or suggest "creating first style information," as recited in Claim 37, Applicant respectfully requests that the rejection of Claim 37 under 35 U.S.C. § 102(e) be withdrawn.

Claims 38-40 depend from Claim 37 and are, therefore, patentable for at least the same reasons as Claim 37. Thus, Applicant respectfully requests that the rejection of Claims 38-40 under 35 U.S.C. § 102(e) be withdrawn.

Claim 41 is directed to a method of controlling Web page creation and includes "transmitting an inquiry about usable functions of the external device to the external device."

The outstanding Office Action refers to the rejection of Claims 1-22 for the rejection of Claims 37-50. Claim 11, which recites "an inquiry unit configured to transmit an inquiry about usable function of the external device to the external device," was rejected at page 7 of the outstanding Office Action on the basis of Fig. 3 of Moshfeghi which is cited as illustrating "operations items presented to a user in a user-specific format corresponding to the usable function of the external device indicated by the usable function identification information."

Applicant respectfully submits that the basis for the rejection of Claim 11 and Claim 41 is not clear.

Applicant also respectfully submits that Moshfeghi does not teach or suggest "transmitting an inquiry about usable functions of the external device to the external device," as recited in Claim 41.

Thus, Applicant respectfully requests that the rejection of Claim 41 under 35 U.S.C. § 102(e) be withdrawn.

Claims 42-44 depend from Claim 41 and are, therefore, patentable for at least the same reasons as Claim 41. Thus, Applicant respectfully requests that the rejection of Claims 42-44 under 35 U.S.C. § 102(e) be withdrawn.

Claim 45 is directed to a method of controlling Web page creation and includes “transmitting an inquiry about allowability of execution of one of the functions corresponding with one of the operation items, to each of the external devices.”

The outstanding Office Action refers to the rejection of Claims 1-22 for the rejection of Claims 37-50. Claim 23, which recites “a permitted-function inquiry unit configured to transmit an inquiry about allowability of execution of a corresponding one of the functions for one of the operation items, to each of the external devices,” was rejected at page 10 of the outstanding Office Action on the basis of the rationale for the rejection of Claims 1-22.

Applicant, therefore, respectfully submits that the rationale for asserting that Moshfeghi anticipates transmitting “an inquiry about allowability of execution” has not been set out in the outstanding Office Action with respect to any claim.

Further, Applicant also respectfully submits that Moshfeghi does not teach or suggest “transmitting an inquiry about allowability of execution of one of the functions corresponding with one of the operation items, to each of the external devices,” as recited in Claim 45.

Thus, Applicant respectfully requests that the rejection of Claim 45 under 35 U.S.C. § 102(e) be withdrawn.

Claims 46-50 depend from Claim 45 and are, therefore, patentable for at least the same reasons as Claim 45. Thus, Applicant respectfully requests that the rejection of Claims 46-50 under 35 U.S.C. § 102(e) be withdrawn.

Claim 51 recites a method including “creating first style information for each of the operation items indicated for display based on operation-item display information which is defined based on a device that displays the Web page or on a user of the device.”

The outstanding Office Action refers to the rejection of Claims 1-22 for the rejection of Claims 51-59. Claim 37 also includes “creating first style information for each of the operation items indicated for display, based on operation-item display information, which indicates the operation items to be displayed and which is defined based on a device on which the Web page is displayed or a user of the device” and was also rejected at page 10 of the outstanding Office Action on the basis of the rejection of Claims 1-22.

As discussed with respect to Claim 37 and with reference to the rejection of Claim 7, Moshfeghi does not teach or suggest “creating first style information,” as recited in Claim 51, because the representation for URIs in Moshfeghi is suggested to be based on the number of available URIs rather than on the user.

Thus, Applicant respectfully requests that the rejection of Claim 51 under 35 U.S.C. § 102(e) be withdrawn.

Claim 52 depends from Claim 51 and is, therefore, patentable for at least the same reasons as Claim 51. Thus, Applicant respectfully requests that the rejection of Claim 52 under 35 U.S.C. § 102(e) be withdrawn.

Claim 53 recites a method including “transmitting an inquiry about usable functions of the external device to the external device.”

Applicant respectfully submits that, as discussed with respect to Claims 11 and 41, Moshfeghi does not teach or suggest “transmitting an inquiry about usable functions of the external device to the external device.”

Thus, Applicant respectfully requests that the rejection of Claim 53 under 35 U.S.C. § 102(e) be withdrawn.

Claim 54 depends from Claim 53 and is, therefore, patentable for at least the same reasons as Claim 53. Thus, Applicant respectfully requests that the rejection of Claim 54 under 35 U.S.C. § 102(e) be withdrawn.

Claim 55 recites a method including “transmitting an inquiry about allowability of execution of one of the functions corresponding to one of the operation items, to each of the external devices.”

Applicant respectfully submits that, as discussed with respect to Claims 23 and 45, Moshfeghi does not teach or suggest “transmitting an inquiry about allowability of execution of one of the functions corresponding to one of the operation items, to each of the external devices.”

Thus, Applicant respectfully requests that the rejection of Claim 55 under 35 U.S.C. § 102(e) be withdrawn.

Claim 56 depends from Claim 55 and is, therefore, patentable for at least the same reasons as Claim 55. Thus, Applicant respectfully requests that the rejection of Claim 56 under 35 U.S.C. § 102(e) be withdrawn.

Claim 57 is directed to an information processing device and includes a “Web page creation unit configured to create the Web page based on both operation-item display information...and usable function identification information, which is received from the external device in response to an inquiry from the communication device and indicated the usable functions of the external device.”

Applicant respectfully submits that, as indicated in the discussion of Claims 11, 41, and 53, Moshfeghi does not teach or suggest that usable function identification information “is received from the external device in response to an inquiry.”

Thus, Applicant respectfully requests that the rejection of Claim 57 under 35 U.S.C. § 102(e) be withdrawn.

Claim 58 is directed to an information processing device and recites that a “Web page creation unit creates the Web page based on both operation-item display information...and permitted-function identification information, which is received from the external devices in response to an inquiry from the communication device and indicates the allowability of execution of each of the functions.”

Applicant respectfully submits that, as indicated in the discussion of Claims 23, 45, and 55, Moshfeghi does not teach or suggest that permitted-function identification information “is received from the external devices in response to an inquiry.”

Thus, Applicant respectfully requests that the rejection of Claim 58 under 35 U.S.C. § 102(e) be withdrawn.

Claim 59 is directed to a Web page creation apparatus and includes:

- a Web page creation unit configured to create a Web page;
- a first storage unit configured to manage common information which is defined in common for two or more users to indicate operation items to be displayed in the Web page;
- a second storage unit configured to manage individual information which is defined for each user to indicate operation items not to be displayed among all the operation items defined in the common information,
- wherein the Web page creation unit is provided to create the Web page so that the operation items extracted from all the operation items of the common information based on the individual information are displayed.

The outstanding Office Action at page 11 refers to the rejection of Claims 1-22 in rejecting Claims 51-59.

Applicant respectfully submits that the rationale for asserting that Moshfeghi anticipates a first storage unit and a second storage unit as recited in Claim 59 is not set out in the rationale for the rejection of Claims 1-22 because Claims 1-22 do not recite a first and second storage unit.

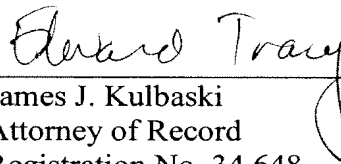
Further, Applicant respectfully submits that Moshfeghi does not teach or suggest a first and second storage unit as recited in Claim 59 or a Web page creation unit "provided to create the Web page so that the operation items extracted from all the operation items of the common information based on the individual information are displayed," as recited in Claim 59.

Thus, Applicant respectfully requests that the rejection of Claim 59 under 35 U.S.C. § 102(e) be withdrawn.

Accordingly, the outstanding rejections are traversed and the pending claims are believed to be in condition for formal allowance. An early and favorable action to that effect is, therefore, respectfully requested.

Respectfully submitted,

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